

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |   |                                   |
|--|---|-----------------------------------|
| VALENE REED, individually and on         | ) |                                   |
| behalf of all others similarly situated, | ) | Civil Action No. 10-cv-5642 (DLC) |
|  | ) |                                   |
| Plaintiff,                               | ) |                                   |
|  | ) |                                   |
| v.                                       | ) |                                   |
|  | ) |                                   |
| CONTINENTAL GUEST SERVICES               | ) |                                   |
| CORPORATION,                             | ) |                                   |
|  | ) |                                   |
| Defendant.                               | ) |                                   |
|  | ) |                                   |

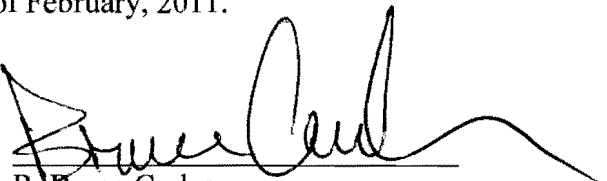
**DECLARATION OF BRUCE CARLSON**

1. My name is Bruce Carlson and I am a founding partner of Carlson Lynch Ltd, resident in the firm's Sewickley, Pennsylvania office.

2. Attached to this Declaration is a Firm Resume, delineating the firm's relevant class action experience since the firm's founding in June 2004.

Under penalty of perjury, I declare that the above statements, and the statements in the attached Firm Resume, are true and correct.

Executed at Sewickley, Pennsylvania this 11<sup>th</sup> day of February, 2011.

  
\_\_\_\_\_  
R. Bruce Carlson

**FIRM RESUME OF CARLSON LYNCH LTD.**

Effective June 1, 2004, Bruce Carlson and Gary Lynch combined their prior practices to form the firm of Carlson Lynch Ltd., with the intention of building a firm that expanded upon their substantial individual experience and success representing plaintiffs in consumer fraud, labor and employment and wage and hour, class action litigation. From June 2004 through January 31, 2011, Bruce Carlson and Gary Lynch were either lead or co-lead counsel representing plaintiffs in the following representative list of settled class actions:

■ *In re Wireless Phone Equipment Replacement Insurance Litigation*, (C.P. Allegheny County, Pennsylvania): Bruce Carlson and Gary Lynch were lead counsel in this national litigation alleging consumer fraud in connection with wireless phone equipment replacement insurance. Following the fairness hearing in November, 2004, the Court entered Findings of Fact and Conclusions of Law which commented on the adequacy of Carlson Lynch as lead counsel as follows:

“Class counsel have abundant experience as lead counsel in consumer class action litigation. Indeed, class counsel have frequently appeared before this Court. Other courts have routinely recognized class counsels’ adequacy . . . . This Court readily agrees with these other courts, and finds that Bruce Carlson and Gary Lynch are more than adequate counsel, and indeed are capable and diligent class action attorneys.”

The settlement was approved and the settlement proceeds were distributed to the class.

■ *Gualano v. Abercrombie & Fitch Stores, Inc.*, (U.S.D.C., W.D. Pa). Bruce Carlson and Gary Lynch were co-lead counsel in this wage and hour litigation alleging that defendant retail clothier was violating federal and state minimum wage laws. Following the fairness hearing in early 2005, where a multi-state settlement was presented to the Court for approval, the Court entered Findings of Fact and Conclusions of Law addressing lead counsels’ adequacy as follows:

“The Court finds the plaintiffs’ counsel, Bruce Carlson and Gary Lynch, are experienced class counsel and that they have met all of the requirements of Rule 23(g)(1)(B) and (C). Consistent with the underlying purpose of Fed. R. Civ. P. 23, plaintiffs’ counsel have achieved, with utmost efficiency, a quality result for the entire class and are commended for the diligence and effective advocacy they have displayed on behalf of their clients.”

■ *Pasci v. Express, LLC*, (U.S.D.C., W.D. Pa.). This case was similar to the *Abercrombie* case discussed above, and proceeded to a fairness hearing in November 2004, where a multi-state settlement was presented to the Court for approval. Regarding the adequacy of Carlson Lynch, the Court issued Findings and Conclusions stating:

“With respect to the adequacy of counsel, the Court finds that class counsel have capably and vigorously represented the class. Bruce Carlson and Gary Lynch have substantial experience in class-based litigation involving Consumer fraud and employment claims . . . . Class counsel achieved an efficient and excellent result on behalf of the class.”

■ *White v. United Steel Workers of America*, (U.S.D.C., W.D. Pa.). Carlson Lynch was co-lead counsel in this age-discrimination class action against the U.S.W.A. After overcoming a motion to dismiss on a legal issue regarding which there was a substantial split of authority, the defendant requested mediation to explore the possibility of settlement. After extensive mediation over a one month period in June 2004, the case ultimately settled for an amount that defense counsel characterized as the highest ever paid by the U.S.W.A. in connection with civil litigation.

■ *In re Community Bank of Northern Virginia and Guaranty National Bank of Tallahassee Secondary Mortgage Loan Litigation*, (U.S.D.C., W.D. Pa.). Carlson Lynch is co-class counsel in this national litigation under the federal Real Estate Settlement Procedures Act. The case originally settled for a cash amount in excess of \$33,000,000.00. Bruce Carlson is lead counsel for the settling plaintiffs and presented the original proposed settlement at a fairness hearing in November 2003. The Court approved the settlement despite a coordinated opt-out and

objection campaign mounted by a consortium of competing plaintiffs' counsel. The objectors appealed the Court's order approving the settlement, and Carlson presented the settling plaintiffs' position at oral argument before the U.S. Court of Appeals for the Third Circuit on February 17, 2005. In August 2005, the Third Circuit vacated the order approving the settlement, and remanded the case for further proceedings relating to the settlement.

After extensive additional briefing on remand, and with the mediation assistance of a former judge from the United States Court of Appeals for the Third Circuit, the settling parties negotiated a modified and enhanced settlement, whereby Defendants have agreed to make available to the class an additional amount in excess of \$14,000,000, so that the value of the total proposed settlement now approaches \$50,000,000.00. At the same time, United States District Court Judge Gary L. Lancaster has issued a lengthy opinion holding that the objectors' argument that the settling plaintiffs should have asserted additional claims under the Truth in Lending Act is not viable. The proposed modified and enhanced settlement was referred to the former Chief Judge of the Western District of Pennsylvania – acting as a friend of the Court –to make an initial determination regarding the fairness and adequacy of the revised settlement. On July 5, 2007, former Chief Judge Ziegler issued an advisory opinion holding that the modified, enhanced settlement is fair, adequate and reasonable for the class.

Thereafter, Judge Lancaster conducted a lengthy hearing regarding whether the proposed settlement class should be certified and the modified settlement preliminarily approved. On January 25, 2008, Judge Lancaster issued an opinion and order certifying the settlement class and preliminarily approving the proposed settlement. A fairness hearing related to the enhanced settlement was conducted on June 30, 2008. On August 15, 2008, the Court issued a comprehensive Opinion and Order granting final approval of the modified settlement.

Objectors have again appealed the final judgment and approval of the modified settlement to the Third Circuit. Following extensive briefing, Bruce Carlson argued the position of the Class before the Third Circuit on April 20, 2010.

The Third Circuit recently issued a published 100 page decision vacating the Order approving the settlement and remanding for further proceedings. Significantly, the Third Circuit has rejected the primary argument raised by the objectors challenging the settlement, and has denied the objectors' petition for rehearing on that issue. The initial post-remand status conference in this case is set for February 2011.

■ *Bannon v. First One Lending, Inc.*, (C.P., Allegheny County, Pennsylvania). Carlson Lynch was co-lead counsel in this class action filed on behalf of Pennsylvania second mortgage loan borrowers alleging that they were charged excessive settlement fees in violation of the Pennsylvania Secondary Mortgage Loan Act. After the court denied defendant's motion to dismiss, the case ultimately settled and plaintiffs and the class were refunded 100% of the alleged overcharge.

■ *Dwight v. American Eagle Outfitters, Inc.*, (C.P., Allegheny County, Pennsylvania). Carlson Lynch was lead counsel in this class action alleging that American Eagle violated the minimum wage laws. The parties negotiated a multi-state settlement, which was approved by the trial court. The settlement proceeds have been distributed to the class.

■ *Tarlecki v. Bebe Stores, Inc.* (U.S.D.C., N.D. CA) Carlson Lynch is co-lead counsel in this wage and hour litigation alleging that defendant retail clothier was violating federal and state minimum wage laws. With the mediation assistance of a former federal judge from the Northern District of California, the parties reached a proposed national settlement, and final approval was granted following a fairness hearing in late 2009, at which Gary Lynch appeared on behalf of the

Class.

■ *Dykeman v. Charming Shoppes, Inc.*, (Sup. Ct., King County, Washington) Carlson Lynch is co-lead counsel in this case alleging violations of the Washington state minimum wage laws. After the Court denied defendants' motion to dismiss and granted plaintiffs' class certification motion, the parties reached a mediated settlement which was approved by the trial judge. The settlement proceeds were distributed to the class in early spring of 2007.

Carlson Lynch is also co-lead counsel in a related case in state court in California on behalf of a class of California Charming Shoppes Employees. The parties in that case negotiated a proposed settlement, and final approval was granted following a fairness hearing in May 2008.

■ *Pitts v. NovaStar Home Loans, Inc. et al.*, (U.S.D.C., S.D., Ga.) Carlson Lynch is co-lead counsel for plaintiffs in this national RESPA class action. The Southern District of Georgia is the MDL court for this litigation. After the Court denied defendant's motion to dismiss, after the court denied defendants' motion for summary judgment and granted plaintiffs' motion for class certification in a related Maryland state court action – where Carlson Lynch was also co-lead counsel, and after extensive discovery including the video depositions of several of defendants' top executives, the parties participated in multiple mediation sessions and ultimately arrived at a proposed national cash settlement wherein class members will be eligible to receive up to \$17,300,000.00. The Court granted preliminary approval of the proposed settlement on July 11, 2007. A fairness hearing was held on September 14, 2007, at which Bruce Carlson appeared on behalf of the class. On September 18, 2007, the court entered an Order granting final approval of the settlement and entering Judgment.

■ *Battaline v. Advest*, (U.S.D.C., W.D. Pa.). Carlson Lynch was lead counsel for plaintiffs in this wage and hour class action alleging that defendant stock brokerage company

violated state overtime laws. After Defendant filed its answer and substantial informal and formal discovery ensued, the parties participated in mediation and reached an agreement regarding a proposed national settlement. The Court entered an order granting final approval of the settlement on September 16, 2008.

■ *Ellis v. Edward Jones* (U.S.D.C., N.D. OH.). Gary Lynch and Carlson Lynch chaired the Plaintiffs' Leadership Committee in this wage and hour class action alleging that defendant stock brokerage company violated federal and state overtime laws. After Defendant filed an answer and after significant discovery wherein Defendant produced in excess of 500,000 pages of documents and hundreds of videotapes, the parties commenced mediation to pursue a potential global settlement. The first mediation, which occurred in Atlanta in March 2007, was unsuccessful. Ultimately, the parties participated in a second mediation in San Francisco, at which the parties arrived at the basic terms of a proposed settlement pursuant to which class members from multiple states will be eligible to receive in excess of \$19,000,000.00. After a fairness hearing on January 5, 2009, the Court granted final approval of the settlement.

■ *Byers v. PNC Financial Services Group, Inc.* (U.S.D.C. W.D. Pa.) Carlson Lynch was lead plaintiff's counsel in this wage and hour class action alleging that defendant stock brokerage company violated federal and state overtime laws. A multi-state settlement was approved following a fairness hearing in June 2008.

■ *Steen v. A.G. Edwards, Inc.* (U.S.D.C., S.D. Ca.) Carlson Lynch was co-class counsel for plaintiff in this wage and hour litigation alleging that defendant stock brokerage company violated federal and state overtime laws. A mediated national class-based settlement has been reached and preliminary approval has been granted. A fairness hearing was held on August 31, 2009 in Los Angeles, and the Court has entered an Order granting final approval of the



settlement.

■ *Meola v. AXA Financial, Inc.* (U.S.D.C., N.D. Ca.) Carlson Lynch was co-class counsel for plaintiff in this wage and hour litigation alleging that defendant financial services company violated federal and state overtime laws. A mediated national class-based settlement was negotiated in this matter and final approval was granted following a fairness hearing in the fall of 2009.

■ *In re St. Francis Health System* (C.P., Allegheny County Pennsylvania) Carlson Lynch was counsel for the class in connection with this wage and hour litigation on behalf of certain former employees of the St. Francis Health System in Pittsburgh. Plaintiff asserted that the class was deprived of severance benefits when St. Francis Health System was acquired by another hospital group in Western Pennsylvania. Prior to the disposition of Plaintiff's class certification motion, the parties engaged in extensive mediation before reaching a class-based settlement.

■ *Haag v. Janney Montgomery Scott* (U.S.D.C., E.D. Pa.) Carlson Lynch was a member of the three firm Executive Committee in this wage and hour class action alleging that defendant stock brokerage company violated federal and state overtime laws. After protracted litigation and two separate mediations, the parties reached a multi-state settlement. A fairness hearing was conducted in Philadelphia on June 30, 2009, where Gary Lynch appeared on behalf of the class. The Court has granted final approval of the settlement.

■ *Steinberg v. Morgan Stanley & Co.* (U.S.D.C., S.D. Ca.) Carlson Lynch was co-class counsel for plaintiff in this wage and hour litigation alleging that defendant stock brokerage company violated federal and state overtime laws. A mediated national class-based settlement was reached and final approval of the settlement has been granted.

■ *Ramsey v. Ryan Beck, Inc.* (U.S.D.C., S.D. N.Y.) Carlson Lynch was co-class counsel in this wage and hour class action alleging that defendant stock brokerage company violated federal and state overtime laws. After protracted litigation, the parties reached a multi-state settlement and final approval was granted in June 2010.

■ *Kniess v. Heritage Valley Health Systems, Inc.* (C.C.P., Allegheny Cty, PA) Carlson Lynch was lead counsel in this wage and hour class action alleging the defendant hospital system failed to pay overtime compensation to its nurse practitioners and physician's assistants. The parties reached a mediated class settlement whereby class members will be eligible to receive the majority of the back pay alleged by Carlson Lynch. The Court has granted final approval of the settlement.

■ *Leadbitter v. The Washington Hospital, Inc.* (U.S.D.C., W.D. PA.) Carlson Lynch was lead counsel in this wage and hour class action alleging the defendant hospital system failed to pay overtime compensation to its nurse practitioners and physician's assistants. The parties recently reached a mediated class settlement whereby class members will be eligible to receive the majority of the back pay alleged by Carlson Lynch, and the settlement has received final approval from the Court.

■ *Kaher v. Ameriquest Mortgage Co.* (U.S.D.C., W.D. Pa./MDL N.D. Ill.). Carlson Lynch was counsel for plaintiff in connection with this consolidated group of class actions alleging the existence a kick-back scheme in violation of RESPA, along with numerous other unfair lending practices. The specific case being handled by Carlson Lynch has broken important new ground under RESPA. Specifically, Carlson Lynch filed this action as a test case to challenge what they viewed as a negative trend in the law regarding how federal trial courts were determining whether a consumer has standing to sue under RESPA, as well as the manner

in which damages are calculated under RESPA. Every prior federal trial court to consider these issues had sided with defendants. In opposing the Ameriquest motion to dismiss that was filed in this case, Carlson Lynch argued that these other federal trial courts had fundamentally misinterpreted the legislative history of RESPA, to support their decisions to dismiss the prior cases. In a seminal decision, the United States District Court for the Western District of Pennsylvania departed from the holdings issued by these other federal courts, and agreed with the arguments of Carlson Lynch, denying the motion to dismiss. *See, Kahrer v. Ameriquest Mortgage Co.*, 418 F.Supp.2d 748 (W.D. Pa. 2006)(Hay, J.). Multiple federal courts of appeal have adopted the *Kahrer* reasoning, including at least the Sixth and Third Circuits.

This case has recently been settled as part of MDL proceedings pending against Ameriquest in the Northern District of Illinois, and final approval of the settlement has been granted.

#### **Other Active Class Actions**

In addition to the above-listed cases, Carlson Lynch is lead, or co-lead counsel in numerous pending class actions including the following:

- *CBS/Viacom Age Discrimination Cases*: Following decertification of a conditionally certified collective action against CBS/Viacom, Carlson Lynch is currently prosecuting approximately twenty individual age discrimination cases against those same companies. After plaintiff in a test case overcame defendants' motion for summary judgment, the court certified an interlocutory appeal to the United States Court of Appeals for the Third Circuit, which was fully briefed and argued by Gary Lynch. The Third Circuit issued its opinion on September 7, 2007. In relevant part, the Third Circuit held that Defendant's conduct may support equitable tolling of the deadline for filing an administrative charge with the EEOC. Carlson Lynch is thus asserting

that there is a question of fact with respect to the timeliness of the claims being pursued by its clients. In other words Carlson Lynch contends that many of the plaintiffs (but not the named plaintiff in the test case because of facts that were unique to his claim) should have the opportunity to present their cases to a jury. Over 60 depositions were conducted in these cases throughout the spring and summer of 2009. The court recently rejected Carlson Lynch's position and granted summary judgment in all of the cases. Carlson Lynch has appealed those rulings and briefing before the Third Circuit was recently completed.

■ *FACTA Litigation.* Carlson Lynch has been counsel for Plaintiffs in numerous putative class actions alleging a violation of the Fair and Accurate Credit Transaction Act. These cases were filed in various federal courts nationally. Motions to Dismiss have been denied in at least four of the cases. A motion for summary judgment was denied in a fifth case. Proposed class-based settlements have been negotiated in more than (20) twenty of the cases, with final approval having been granted, and judgment entered, in those cases.

On June 4, 2008, Congress passed an amnesty bill that eliminated potential liability for every defendant that had a FACTA case pending against it as of that date, but did not change the law going forward. As a result, several defendants with which Carlson Lynch had negotiated class settlements—wherein final judgment had not been entered—attempted to retreat from settlements based upon the change in law. Two judges in the Western District of Pennsylvania, and one judge in the Eastern District of Pennsylvania, issued orders and wrote opinions supporting Carlson Lynch's efforts to enforce the settlements, and those cases proceeded to judgment. One judge in the Western District of Pennsylvania refused to enforce a similarly postured class settlement, and vacated the preliminary approval order that she had previously issued. Carlson Lynch appealed that decision and the Third Circuit reversed in a published

decision issued on June 15, 2010. The Third Circuit directed the trial judge to enforce the settlement, and a fairness hearing in that case was held on February 10, 2011, at which time final approval of the settlement was granted.

Carlson Lynch has recently filed multiple new FACTA cases, and discovery in those cases is ongoing, with proposed class settlements negotiated in several of the cases during late 2010 and early 2011.

■ *Crozer-Keystone Health System Overtime Litigation (Nurse Practitioners/Physician's Assistants)*. Carlson Lynch filed a putative collective action against Crozer-Keystone Health System in the Eastern District of Pennsylvania. The Complaint challenges pay practices related to nurse practitioners and/or physicians' assistants. The plaintiffs in these cases allege that they are illegally being denied overtime compensation by their employers. After discovery, the Parties filed cross motions for summary judgment. In a widely reported opinion issued on January 4, 2011, the Court granted Plaintiff's motion for summary judgment, holding that Defendant has misclassified individuals in Plaintiff's job position. Since that decision was issued, Carlson Lynch has filed a class action against the same Defendant in Pennsylvania state court, asserting the same claims under Pennsylvania state law.

■ *Hospital Meal-Break Overtime Litigation*. During 2010, Carlson Lynch filed numerous putative class and/or collective actions on behalf of hourly health care workers (primarily nurses) alleging improper pay practices in connection with automatic meal break deductions. These cases are inactive litigation. Some of the defendants in these cases include: UPMC, West Penn Allegheny, Genesis Health Care Philadelphia, Northwestern University Health Care System Chicago, Kindred Health Care/Chicago, Vanderbilt University Health Care System, and HCA, Inc. Document and deposition discovery is ongoing in most of the cases.

Conditional certification notice has been or soon will be distributed to putative class members in certain of the cases. There has been active motions practice in a number of the cases as well, with numerous issues currently pending before multiple federal courts of appeal.

■ *EFTA Litigation.* Within the past year, Carlson Lynch has filed putative class actions in multiple federal venues under the Electronic Fund Transfer Act. These cases allege that various automated-teller machine (“ATM”) operators (primarily financial institutions) violated mandatory ATM fee disclosure requirements, and therefore were not permitted to impose transaction fees on ATM users at their machines. Motions to dismiss were granted in two cases, and the orders granting dismissal were appealed to the Third Circuit in both of those cases. The Third Circuit recently reversed the Orders granting the motions to dismiss, and both of those cases were remanded for further proceedings, and then settled on a class basis. Class settlements have been negotiated in approximately fifteen additional cases to date. Some cases have been settled on an individual basis, in instances when the transaction volume at the ATMs in dispute is not sufficient to warrant class litigation. Numerous cases remain pending and are in active litigation.

■ *Unlicensed Accountant Misclassification Litigation.* Within the past six months, Carlson Lynch has commenced litigation on behalf of unlicensed accountants who were classified as being exempt from eligibility from overtime compensation. Carlson Lynch is challenging the propriety of that classification. This litigation is in its early stages.

■ *Career Education Corporation Misclassification Litigation.* Within the past month, Carlson Lynch filed a putative collective action on behalf of admissions representatives employed by culinary schools operated by Career Education Corporation. Carlson Lynch alleges that these individuals were misclassified and improperly denied overtime benefits.



## **FIRM PARTNERS**

### **Bruce Carlson**

Bruce Carlson is from Wilkinsburg, Pennsylvania, where he attended the public schools. He graduated from the University of Pittsburgh School of law in 1989. He was the Executive Editor of the Journal of Law and Commerce in law school. He also obtained his undergraduate degree from the University of Pittsburgh, graduating *summa cum laude* in political philosophy. After law school, he was employed for approximately four years at Eckert Seamans Cherin & Mellott, in Pittsburgh. Subsequently, he was a member at the Pittsburgh plaintiffs-FELA and mass tort firm previously known as Peirce Raimond, Osterhout, Wade, Carlson & Coulter. During his five year tenure at the Peirce firm, Carlson developed and managed one of the largest, if not the largest, pediatric lead poisoning practices in the country. After his practice evolved and began to focus more on consumer class action litigation, he affiliated the practice with a prominent Pittsburgh-based plaintiffs' class action firm. During the three and one-half years that he was affiliated with that firm, Carlson originated and was lead counsel in more consumer class cases than any lawyer in Western Pennsylvania. These cases were filed not only in Western Pennsylvania, but in state and federal courts throughout the country. Effective June 1, 2004, Carlson ended his relationship with his former firm and aligned his practice with his law school friend and frequent co-counsel, Gary Lynch.

Carlson is admitted to practice in the state courts of Pennsylvania and West Virginia, the United States District Courts for the Western and Middle Districts of Pennsylvania, the Northern and Southern Districts of West Virginia, the Northern District of Ohio, the Southern and Eastern Districts of Texas, the District of Maryland and the United States Courts of Appeal for the Third and Eleventh Circuits. He is a member of the Million Dollar Advocates Forum. He is a member

of the American Association of Justice, and the Pennsylvania, Western Pennsylvania and West Virginia Trial Lawyers Associations.

**Gary Lynch**

Gary Lynch is from New Castle, Pennsylvania, where he attended the public schools. He has been engaged in the practice of complex litigation on behalf of plaintiffs for the last fifteen years. He graduated from the University of Pittsburgh School of Law in 1989, after obtaining a Bachelor of Science degree in Accounting at Penn State University in 1986. While in law school, he was the Topics Editor of the *Law Review*.

After graduating from law school, Lynch was initially employed by Reed Smith, then the largest law firm in Pittsburgh. After working at that firm for several years and focusing primarily on litigation defense, he decided that he wanted to start his own practice, representing plaintiffs rather than defendants. Initially, he specialized in employment litigation on behalf of plaintiffs, and in that context, successfully handled both individual cases and class actions.

From 1994 through 1999, he served as the managing partner of a four-attorney "boutique" firm, focusing on plaintiff employment litigation, complex personal injury, Workers' Compensation and Social Security disability. During this time, Lynch began to focus his practice on class litigation, at first solely in the context of employment discrimination litigation. Since founding Carlson Lynch with Bruce Carlson in 2004, he has continued his practice in plaintiffs' employment litigation and, at the same time, has increasingly worked on consumer class actions. In collaboration with Bruce, Gary has been successful in expanding his class action practice nationally. Gary is currently spearheading nationwide class litigation involving a number of different industries and practices. He oversees all of the firm's labor and employment class litigation.



Gary is admitted to practice in the state courts of Pennsylvania, the United States District Courts for the Western, Middle and Eastern Districts of Pennsylvania, the Northern and Southern Districts of Ohio, the Northern District of Illinois and the United States Courts of Appeal for the Third, Seventh, Ninth and Eleventh Circuits.

## **ASSOCIATES**

### **Pam Miller**

Pam graduated from Westminster College in 1989 with a degree in history and political science. She graduated from the University of Pittsburgh School of Law in 1993. Pam oversees the firm's disability practice and also works on individual employment discrimination cases. She also assists Gary Lynch and Bruce Carlson in the firm's complex litigation practice.

### **Stephanie Goldin**

Stephanie attended the College of William of Mary, where she graduated in 2000 with a Bachelors of Business Administration, with a minor in economics. She graduated *cum laude* from the University of Pittsburgh School of Law in 2006. While at Pitt, Stephanie served on the Journal of Law and Commerce. Stephanie assists both Bruce Carlson and Gary Lynch in all aspects of the firm's complex litigation practice.

## **OF COUNSEL:**

### **Tom Withers**

Tom became of counsel to Carlson Lynch in June 2008.

Tom graduated from the University of Georgia law school in 1984. He also received his undergraduate degree from the University of Georgia.

After graduating from law school, Tom joined Oliver, Maner and Gray, in Savannah, Georgia, where he was a partner from 1988 until 1990. While at Oliver, Maner and Gray, Tom

was primarily engaged in the defense of medical malpractice cases for physicians. During his six years with the firm, Tom tried approximately ten medical negligence cases to verdict, all of which resulted in verdicts for the defendants.

Thereafter, Tom joined the United States Attorney's Office in the Southern District of Georgia, where he remained for eight years. Tom initially served as an Assistant U.S. Attorney in the Criminal Section before becoming Chief of the Criminal Section in 1993. Tom also served as a Professional Responsibility Officer during his time with the United States Attorney's Office and was given the Department of Justice's Director's Award in 1997.

In 1998, Tom left the United States Attorney's Office and became a founding partner of Gillen Parker & Withers (now, Gillen Withers & Lake, LLC). Tom's practice focuses on federal and state criminal defense, Medicare/Medicaid fraud, and complex civil litigation.

Tom is admitted to practice in the state courts of Georgia, the United States District Courts for the Southern and Northern Districts of Georgia, and the United States Court of Appeals for the Eleventh Circuit.